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10 acting by and through the California Highway
Patrol (erroneously sued as "State of California")
11 and Michael Bell*

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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17 **EDGAR SOLIS,**

18 Plaintiff,

19 v.

20 **COUNTY OF RIVERSIDE; STATE**
21 **OF CALIFORNIA; SALVADOR**
22 **WALTERMIRE; and DOES 1-10,**
inclusive,

23 Defendants.
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5:23-cv-00515-HDV-JPR

**DEFENDANTS' THIRD
AMENDED WITNESS LIST**

Date: February 18, 2025

Time: 9:00 a.m.

Courtroom: 10D

Judge: The Honorable Hernan
D. Vera

Trial Date: February 18, 2025

Action Filed: 2/02/2023

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants State of California, acting by and through the California Highway Patrol, and Michael Bell hereby serve the following list of witnesses who may be called during trial. Defendants reserve the right to supplement or amend this list.

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Michael Bell, Defendant, CHP Officer	Officer Bell is the defendant and will testify about his interactions with Plaintiff, training and experience with the CHP.	1.25		
M. Vargas, Lieutenant, CHP San Gorgonio Pass	Stationed at San Gorgonio Pass Area Office, Field Operations. Involved in post-shooting investigation and knowledge of Defendant Bell's tactical training.	45 minutes	45 min	
D. Harris, Sergeant, CHP San Gorgonio Pass	Stationed at San Gorgonio Pass Area Office, Field Sergeant and knowledge of Defendant Bell's tactical training.	45 minutes	45 min	
C. Hamilton, Lieutenant, CHP Border Division CIIT	CHP Critical Incident Investigation Team, Leader. Involved in CHP critical incident investigation of the incident involving use of force on Plaintiff.	1 hour	1 hr	
J. Kawanaka, Sergeant, CHP Border Division CIIT	CHP Critical Incident Investigation Team, Lead Administrative Investigator. Involved in CHP critical incident investigation of the incident involving use of force on Plaintiff.	45 minutes	45 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Daniel Moody, Detective	Riverside County Sheriff Department involved in the subsequent scene control or incident investigation and plaintiff's blood sample.	45 minutes	45 min	
J. Manjarrez, Detective	Riverside County Sheriff Department officials. Collected white bag of powdery substance from plaintiff's car suspected fentanyl and blood sample.	30 minutes	30 min	
A. Dittfurth, Deputy	Riverside County Sheriff Department official involved in the incident investigation. Surveillance video from 642 Taschner Drive and plaintiff's firearm forensic analysis.	30 minutes.	30 min	
Daniel Cline, Deputy	Riverside County Sheriff Department official involved in the incident investigation, obtained pictures, DNA swab, and Scanner data.	20 minutes	20 min	
Jennifer Jernegan, Lead Forensic Evidence Supervisor	Riverside County Sheriff Department officials involved in the incident investigation.	20 minutes	20 min	
Yesika Alvarado, Forensic Evidence Technician	Riverside County Sheriff Department official involved in the incident investigation. Captured pictures of scene, bullet holes and charted plaintiff's firearm.	40 minutes	40 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
A. Carey, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Obtained pictures of scene and plaintiff in hospital and first aid supplies and clothing.	20 minutes	20 min	
Venderfees, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Obtained pictures of pursuit termination at 632 Taschner Drive and point of rest of plaintiff's car and carport damage.	20 minutes	20 min	
Esteban Carranza, Investigator	Riverside County District Attorney's Investigator involved in the criminal investigation of the incident.	30 minutes	30 min	
J. Gonzalez, Lieutenant	Hemet Police Department Officer responded to the area where Plaintiff fled and where shots were fired and involved in the subsequent scene control or incident investigation.	30 minutes	30 min	
D. Maddox, Sergeant	Hemet Police Department Officer responded to the area where Plaintiff fled and where shots were fired and involved in the subsequent incident investigation.	30 minutes	30 min	
G. Gomez, Detective	Hemet Police Department Officer involved in the incident investigation.	20 minutes	20 min	
Amy Lim and/or Custodian of	Riverside University Hospital laboratory sample collection of	15 minutes	15 minutes	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Records	blood from Plaintiff at hospital.			
Kristen Steward, M.S., D-ABFT-FT	Bio-Tox Laboratories Personnel involved in the testing and analysis of blood obtained from Plaintiff.	30 minutes	30 min	
Ola Bawardi, M.S.	Bio-Tox Laboratories Personnel involved in the testing and analysis of blood obtained from Plaintiff.	30 minutes	30 minutes	
Greg Meyer, Captain (Ret.)	Police Practices Expert will explain POST standards from basic law enforcement training and use of force tactics applicable to facts of this case.	2 hours	1 hr, 15 min – 1 hr 30 min	
Parris Ward, Forensic Video Analyst	Forensic video/audio analyst. Will testify regarding his assessment of BWC footage and security cameras near the shooting location and information that can be derived in relation to incident shooting.	1 hour	45 min	
Ronald Kvitne, M.D.	Board certified orthopedic surgeon medical expert will testify about his review and analysis of plaintiff's medical records as they pertain to Plaintiff's injuries including further treatment.	45 minutes	30-40 min	
Michael Ritter, M.D.	Emergency Medicine expert will testify about his review and analysis of plaintiff's Toxicology drug results positive for methamphetamine and PCP and other	1 hour	45 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	medical records pertaining to Plaintiff's injuries.			
Leslie Martinez	Resident of the property where the incident occurred who heard yelling and gunshots.	20 minutes	20 min	
Marlene Sue Biggs	Resident who observed 2-3 officers chase a male adult and heard gunshots	20 minutes	20 min	
Jose Jesus Rodriguez	Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Ana Rodriguez	Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Liliana Rodriguez	Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Pearo Rodriguez	Resident who provided surveillance video from camera mounted to front of residence	20 minutes	20 min	
Florina Maria Mandujano	Resident who provided surveillance	20 minutes	20 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	video from camera mounted to front of residence			
Thomas Jordan	Resident who provided surveillance video from camera mounted to front of residence	15 minutes	15 min	
Nidia Santana	Resident who provided surveillance video from camera mounted to front of residence	15 minutes	15 min	
Richard Contla	Resident who heard a crashing sound and observed the suspect jump over an east wall. Then heard one of the officers yell, "He's got a gun" followed by numerous gunshots and shouting. Mr. Contla recognized suspect, having seen him in the area before the incident.	30 minutes	30 min	
Kathy Lynn Cassel	Resident of the area where the suspect collided with the Kia Sorrento causing damage to the Kia, support post for the parking stall awning and block wall	20 minutes	20 min	

1 Dated: January 28, 2025

Respectfully submitted,

2 ROB BONTA
3 Attorney General of California
4 DONNA M. DEAN
5 Supervising Deputy Attorney General
6 DAVID KLEHM
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8 TAMMY KIM
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s/ Tammy Kim

*Attorneys for Defendants State of
California, acting by and through the
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11 *Indicates that witness will be called only if the need arises.
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